

December 16, 2022

The Honorable Judge Ronnie Abrams
United States District Court Southern District of New York
40 Foley Square, Room 2203 New York, NY 10007

The Honorable Judge Sarah L. Cave
United States District Court Southern District of New York
500 Pearl St. Courtroom 18A New York, NY 10007-1312

RE: Plaintiff's Fact Discovery Status Letter and Expert Witness Report Extension

To Honorable Judge Cave and The Honorable Judge Abrams,

Plaintiff's extends an immediate response and apology to the Court for my delayed Fact Discovery letter.

Plaintiff reminds the Court that on Dec. 8, 2022, Plaintiff set forth an application for an extension for my expert witness reports. Most notably, my art appraisal expert witness, who is not free until January as evidenced in her email dated Dec. 6, 2022 that has been filed in Doc. 330. Plaintiff regrets that none of my expert witnesses can produce an expert report by Monday Dec. 19, 2022. I ask the Court to understand that in October, all my expert witnesses were ready, however Discovery issues with the Defendants were present. All of my experts expressed interest in reviewing my evidence that I produced, which is logical. At present, I have now encountered difficulty adjusting my expert witnesses with the Court schedule. In Doc. 330 dated Dec. 8, 2022 I set forth emails from my witness expressing unavailability due to their prior commitments.

EXHIBIT #1 Email filed with Dec. 8, 2022 letter in Doc. 330.

Pro Se Plaintiff informs the Court regarding my Discovery status and that it was delayed. On Dec. 15, 2022 Plaintiff and WorthPoint's attorney Nicole Haimson reviewed Plaintiff's Production of Evidence which surpasses nine hundred pages. Due to some minor yet significant issues, a follow up phone meeting to correct and reorganize Plaintiff's documents was scheduled Friday morning Dec. 16, 2022 which concluded on or around noon. All of Plaintiff's submitted Fact Discovery are soundly resolved.

Additionally, submitted late eve on Dec. 15, 2022, Plaintiff filed a letter petitioning the Court to reconsider Plaintiff's request for the production for one native electronic Original email directly exported to a PDF file for the Ebay 2012 sale of the 1972 Original Oil Painting Man With Red Umbrella.

Lastly, due on Monday is Plaintiff's Proposed Amended Complaint to include the Court's Complaint application. At this juncture, is Plaintiff permitted to file exhibits with my Proposed Amended Complaint or to include Plaintiff's evidence? Plaintiff did contact the NYLAG with questions regarding exhibits and Plaintiff's evidence however no responses were set forth upon filing this letter.

Once again, outside of the Plaintiff's desire for the PDF file for the Ebay 2012 sale of the 1972 Original Oil, Plaintiff's Fact Discovery is complete.

December 16, 2022
Annamarie Trombetta
175 East 96th Street
New York, New York 10128

Respectfully Submitted.

Electronic Signature

/s/ Annamarie Trombetta

Annamarie Trombetta

EXHIBIT #1

Gmail - Past Appraisal Letter



Annamarie Trombetta <atrombettaart@gmail.com>

Past Appraisal Letter

Abigail Hartmann <appraisersaha@gmail.com>

To: Annamarie Trombetta <atrombettaart@gmail.com>

Tue, Dec 6, 2022 at 10:23 AM

Hi Annamarie, unfortunately due to our workload, I cannot complete a report by your 12/12 deadline. We are completely booked until at least early January.

Best wishes, Gayle Skluzacek

[Quoted text hidden]